

REMARKS

Claims 1-18 were previously presented in the above-identified application. Upon entry of this response, which amends claims 1-10 and 12-18, and adds claims 19-26, claims 1-26 remain pending. The Applicant respectfully requests reconsideration of the rejections in view of the claim amendments and the following remarks. No new matter has been added with this response.

Section 112: Second Paragraph.

Originally filed claim 9 and dependent claims 10-12 have been rejected under 35 U.S.C. § 112 ¶ 2 as being indefinite for failing to particular point out and distinctly claim the subject matter that the Applicant regards as the invention. Specifically, the claim language was indicated as being unclear as to the meaning of “in use” and “no use.” Applicant has amended claims 9 and 10 to clarify the claim language. As such, the Applicant respectfully submits that amended claims 9 and 10 overcome this rejection.

Section 102(b): Peters.

Claims 1, 8, 15 and 16 have been rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,104,868 (“Peters”). Applicant respectfully traverses this rejection for at least the following reasons.

Claims 1 and 16.

Applicant respectfully submits that Peters fails to disclose each of the elements set forth in amended claims 1 and 16. For example, amended claim 1 now recites “a converter that generates a second SNMP trap upon including an identifier in said first SNMP trap for

identifying a terminal located in the first network.” Claim 16 recites similar elements as amended claim 1.

The Office Action on p. 3 indicates that Peters discloses “a peer agent receiving an SNMP trap from a communications device in a network” and “converting the trap indication to another format thus generating another trap,” thereby implying that the “conversion” performed by Peters is equivalent to the “converter” of claim 1. Applicant respectfully disagrees.

Rather, Peters appears to disclose that a peer agent converts only operating system-specific SNMP traps to an operating system-independent (i.e., generic) format (and vice versa). Namely, Peters states:

The peer agent component 32a is designed to operate within the confines of the network operating system specific interface and the abstraction which enabled its partitioning into operating specific and generic module components for performing operating system functions and generic functions as required for operating with above mentioned types of network operating systems. The operating system specific (dependent) component contains modules which . . . convert OS specific request PDUs into OS independent request PDUs, convert OS independent response PDUs into OS specific response PDUs, convert OS independent trap PDUs into OS specific trap PDUs, convert OS specific trap PDUs into OS independent trap PDUs

See col. 7, lines, 6-23 (emphasis added). See also FIG. 6C (“Peer Agent (32) uses an OS dependent functions to convert the trap indication from a generic format to the OS specific format”) (emphasis added).

Because the converter of claim 1 “generates a second SNMP trap upon including an identifier in said first SNMP trap for identifying a terminal located in the first network,” rather than “converting OS specific trap PDUs into OS independent PDUs,” it cannot be said that Peters teaches or even suggests the converter set forth in claim 1. As such, amended claim 1 is distinguishable from Peters. Claim 16 is distinguishable from Peters, too, as it recites similar novel and nonobvious elements.

Accordingly, Applicant respectfully submits that claims 1 and 16 are patentable and thus are now in condition for allowance. As claims 2-12 and 17-18 depend from allowable claims 1 and 16, respectively, these dependent claims are patentable for at least the same reasons. Therefore, an indication of allowable subject matter is respectfully requested for claims 1-12 and 16-18.

New Claim 19 and 22.

Applicant respectfully submits that Peters fails to disclose each of the elements set forth in new claims 19 and 22. For example, claim 19 recites “a converter that changes a predetermined part of an agent address part,” and “a second SNMP trap including a value corresponding to an alternate address in said second network.” Claim 22 recites similar elements as claim 19. But as explained at page 4, ¶ 7 of the Official Action, “Peters fails to teach . . . a value corresponding to an address in said second network” to generate said second trap. So, these new claims 19 and 22 include subject matter that is distinguishable from the teachings of Peters, thereby obviating this rejection. The Applicant therefore kindly submits that independent claims 19 and 22 are patentable, as well as any claims that depend therefrom.

Claims 8 and 15.

Applicant respectfully submits that Peters also fails to disclose each of the elements set forth in amended claims 8 and 15. For example, Peters does not teach “a reading unit that reads said first trap from said holding unit in response to a read request of said first trap,” which claim 8 recites.

But in the Office Action at p. 4, an “instrument abstraction component” of Peters is said to be “where traps are sent to be held for further processing.” Applicant respectfully disagrees that the “instrument abstraction component” of Peters is equivalent to the reading unit of the claimed invention. Rather, Peters indicates that “component 34 builds an IABS TRAP PDU and queues the PDU to be sent (i.e. blocks 714-2416 and 714-2418) and continues that loop until all of the conditions have been tested.” See col. 18, lines 3-7. So although Peters apparently suggests “queuing” a trap, Peter fails teach or suggest that a trap is read as a “first trap from [a]

holding unit in response to a read request of said first trap, corresponding to said second trap,” as recited in claim 8.

For at least these reasons, claim 8 is distinguishable from the teachings of Peters, and therefore is patentable. And for similar reasons, Applicant respectfully submits that claim 15 includes at least some of the same patentable subject matter of claim 8. Accordingly, claims 8 and 15 are in condition for allowance. As amended claims 13 and 14 now depend from allowable claim 15, these dependent claims are patentable for at least the same reasons.

Section 103(a): Veerina.

Claims 2, 4, 5, 7, 14 and 18 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Peters in view of U.S. Patent No. 6,243,379 (“Veerina”). After entry of this Amendment, Applicant respectfully submits that this rejection is obviated for at least the following reasons.

Claims 2, 4, 5, 7, 14 and 18.

Applicant respectfully disagrees that Veerina teaches or suggest any more than merely translating an IP address to an external IP address to allow transmission to an external network. This fails to teach the feature of the converter as claimed. Regardless, claims 2, 4, 5 and 7 depend from allowable claim 1, claim 14 depends from allowable claim 15, and claim 18 depends from allowable claim 16. And as such, all these dependent claims are patentable for at least the reasons set forth above.

New Claims 19 and 22.

Claim 19 includes some of the elements of original claim 2, which Applicant believes includes additional patentable subject matter. In particular, claim 19 recites “a converter that changes a predetermined part of an agent address part,” and “a second SNMP trap including a value corresponding to an alternate address in said second network . . . , wherein said agent

address part is configurable to simultaneously include multiple values identifying multiple addresses.”

By contrast, Veerina seems to disclose replacing only an entire Internet Protocol (“IP”) address with another entire IP address; Veerina fails to suggest otherwise. See e.g., col. 2, lines 14-17 (“In particular, during outbound LAN1-LAN2 packet processing, [a] destination IP address . . . [is] replaced with [an] external IP address . . .”). As such, Veerina neither teaches nor suggests an “agent address part is configurable to simultaneously include multiple values identifying multiple addresses,” as set forth in new claim 19. Applicant believes the same can be said of new claim 22, which includes some common novel and nonobvious subject matter as set forth in claim 19.

For at least these reasons, claims 19 and 22 are distinguishable from Veerina, whether considered alone or in combination with other cited art, and thus are patentable. Accordingly, Applicant respectfully submits that claims 19 and 22 are in condition for allowance.

New Claims 21, 24 and 26.

Claims 21, 24 and 26 include novel and nonobvious subject matter. For example, claim 21 recites a converter that “changes said predetermined part of a port number part . . . to information for identifying said communication apparatus in said first network . . . , said information in said predetermined part of said port number part including port number information encoded with another value representative of an address of said communication apparatus.”

By contrast, Veerina seems to only disclose replacing an entire port number with another entire port number; Veerina fails to suggest otherwise. See e.g., col. 2, lines 14-17 (“In particular, during outbound LAN1-LAN2 packet processing, [a] destination . . . port number of outgoing packet [is] replaced with [an] external . . . port number.”). As such, whether considered alone or in combination with other cited art, Veerina neither teaches nor suggests “said information in said predetermined part of said port number part including port number information encoded with another value representative of an address of said communication apparatus,” as set forth in claim 21.

And for similar reasons, Applicant respectfully submits that claims 24 and 26 include at least some of the same patentable subject matter. For example, claim 26 recites that “said port number part includ[es] information decodable to yield a port number and a value representative of an address of said communication apparatus.” So, claims 21, 24 and 26 include subject matter that is distinguishable from the teachings of Veerina. The Applicant therefore respectfully submits that independent claims 21, 24 and 26 are patentable, as well as any claims that depend therefrom.

Section 103(a): Spencer.

Claims 3, 6, 13 and 17 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Veerina in view of U.S. Patent No. 6,253,243 (“Spencer”). After entry of this Amendment, Applicant respectfully submits that this rejection is obviated for at least the following reasons.

Claims 3, 6, 13 and 17.

Applicant respectfully disagrees that Spencer teaches or suggest any more than merely an SNMP trap with a timestamp field. Regardless, claims 3 and 6 depend from allowable claim 1, claim 13 depends from allowable claim 15, and claim 17 depends from allowable claim 16. And as such, all these dependent claims are patentable for at least the reasons set forth above.

New claims 20, 23, and 25.

Claims 20, 23, and 25 include additional novel and nonobvious subject matter. As an example, claim 20 recites changing a “predetermined part of said time stamp . . . to information for identifying said communication apparatus . . . , said information . . . representative of an address of said communication apparatus.” By contrast, Spencer at most discloses a timestamp field for holding a value representing a time “between the last re-initialization of [an] agent system and the time when [a] trap was generated.” See col. 7, lines 32-34. Accordingly, Spencer cannot be said to teach or suggest a timestamp field that includes a “value representative of an address of said communication apparatus” rather than time stamp information. As such, the subject matter set forth in claim 20 is distinguishable from Spencer.

As another example, claim 23 recites a converter that "encodes [] other information in [a] predetermined part of a time stamp part . . . with information representative of said address conversion apparatus . . ." Spencer, too, fails to teach or suggest the subject matter of claim 23, which is distinguishable from Spencer. Consequently, Spencer cannot be said to teach or suggest the claimed combination when considered alone or when combined with other cited art.

Accordingly, Applicant respectfully submits that claims 20, 23 and 25 are patentable and thus are now in condition for allowance. As claim 25 includes similar elements as allowable claim 20, these claims too are patentable for at least the same reasons. Therefore, an indication of allowable subject matter is respectfully requested for claims 20, 23 and 25.


In sum, all of the independent claims and their associated dependent claims should be in a condition for allowance, which is respectfully solicited. If the Examiner believes that any of the claims are not in a condition for allowance, the Examiner is encouraged to contact the undersigned to resolve any outstanding issues.

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